

Hon. Richard A. Jones

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JENNIFER and EUGENE WONG, for themselves
and as parents of Student JW, a minor,

Plaintiffs,

v.

SEATTLE SCHOOL DISTRICT NO. 1,

Defendant.

No. C16-1774 RAJ

SECOND DECLARATION OF DAVID
HOKIT IN SUPPORT OF
DEFENDANT'S MOTION FOR
PARTIAL SUMMARY JUDGMENT

David Hokit declares and states as follows:

1. Declarant. I am the attorney for Seattle Public Schools (District) in the above-captioned matter. I am over the age of 18 and competent to testify to the matters stated in this declaration. I make this second declaration based on my own personal knowledge.

2. Administrative Claim under the IDEA. Prior to this suit, Plaintiffs filed a special education due process hearing request against the District on March 2, 2015. The District and Plaintiffs engaged in settlement negotiations in relation to that request in February and March 2016. As part of those negotiations, the District made a settlement proposal that included

1 a full release of claims by Plaintiffs. It is standard practice to request a full release of claims in
2 settlement negotiations that include some consideration being provided by the non-releasing
3 party. Those negotiations were unsuccessful and the case proceeded to hearing.

4 I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE
5 OF WASHINGTON THAT THE FOREGOING STATEMENT IS TRUE AND CORRECT.

6 Dated this 27th day of July, 2017.

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8 /s/ David T. Hokit
9 DAVID HOKIT, WSBA #13512
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